

**SHUB LAW FIRM LLC**  
Jonathan Shub (SBN 237708)  
Kevin Laukaitis\*  
134 Kings Highway E, 2nd Floor  
Haddonfield, NJ 08033  
T: 856-772-7200  
F: 856-210-9088  
Email: [jshub@shublawyers.com](mailto:jshub@shublawyers.com)  
[klaukaitis@shublawyers.com](mailto:klaukaitis@shublawyers.com)

**KELLER & HECKMAN, LLP**  
Robert S. Niemann (SBN 87973)  
Natalie E. Rainer (SBN 252456)  
Three Embarcadero Center, Suite 1420  
San Francisco, CA 94111  
T: (415) 948-2800  
Email: [niemann@knlaw.com](mailto:niemann@knlaw.com)  
[rainer@khlaw.com](mailto:rainer@khlaw.com)

*Attorneys for Plaintiff and the Class*

*Attorneys for Defendant*

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA**

JEANNE MATTHEWS, individually  
and on behalf of all others similarly  
situated.

Plaintiff.

V.

## MORTON & BASSETT SPICES,

Defendant.

Case No.: 3:22-cv-00497-JD

**JOINT STIPULATION TO  
EXTEND PLAINTIFF'S TIME TO  
FILE AMENDED COMPLAINT**

The Hon. James Donato

Trial Date: None Set

Pursuant to Civil Local Rules 6-2 and 7-12, Plaintiff Jeanne Matthews (“Plaintiff”) and Defendant Morton & Bassett Spices (“Defendant”), through their respective attorneys, stipulate and declare as follows:

WHEREAS, Plaintiff filed their Complaint on January 25, 2022.

WHEREAS, Defendant filed their Motion to Dismiss Plaintiff's complaint on March 18, 2022.

1 WHEREAS, Plaintiff intends to amend her Complaint in lieu of a response to  
2 the Motion to Dismiss;

3 WHEREAS, Fed. R. Civ. P. 15(a) gives Plaintiff a right to amend her Complaint  
4 within twenty-one (21) days of service of Defendant's Motion to Dismiss.

5 WHEREAS, Plaintiff's deadline to amend her complaint is April 29, 2022.

6 WHEREAS, the Parties have engaged in preliminary settlement discussions;

7 WHEREAS, the Parties seek to continue these settlement discussions in an  
8 effort to resolve this dispute and potentially avoid protracted litigation;

9 WHEREAS, this is the second extension sought by the Parties for the filing of  
10 an amended complaint, but the third extension requested altogether

11 WHEREAS, the Parties seek an additional thirty-one (31) days for Plaintiff to  
12 file her amended complaint.

13 IT IS THEREFORE STIPULATED AND AGREED by and among the parties  
14 in the above-captioned matter that:

15 1. The deadline for Plaintiff to file her Amended Complaint will be May 30,  
16 2022.

17 AGREED AND CONSENTED TO:

18 Dated: April 21, 2022

**SHUB LAW FIRM LLC**

26 /s/ Jonathan Shub  
27 Jonathan Shub (SBN 237708)  
28 Kevin Laukaitis\*

134 Kings Hwy E, Fl-2  
Haddonfield, NJ 08033  
T: (856) 772-7200  
[jshub@shublawyers.com](mailto:jshub@shublawyers.com)  
[klaukaitis@shublawyers.com](mailto:klaukaitis@shublawyers.com)

5 *Attorneys for Plaintiff and the Proposed Class*

6 Dated: April 21, 2022

7 **KELLER & HECKMAN, LLP**

8 /s/ Robert S. Niemann  
9 Robert S. Niemann ( SBN 87973)  
10 Natalie E. Rainer (SBN 252456)  
11 Three Embarcadero Center, Suite 1420  
12 San Francisco, CA 94111  
13 Tel: (415) 948-2800  
Email: [niemann@khlaw.com](mailto:niemann@khlaw.com)  
Email: [rainer@khlaw.com](mailto:rainer@khlaw.com)

14 *Attorneys for Defendant*  
15 *Morton & Bassett Spices*

## ATTESTATION

I, Jonathan Shub, am the ECF user whose ID and password are being used to file this document. In compliance with Local Rule 5-1(i)(3), I attest that concurrence in the filing of the document has been obtained from each of the other signatories.

Dated: April 21, 2022

/s/ Jonathan Shub  
Jonathan Shub

**[PROPOSED] ORDER**

2 Pursuant to the parties' Stipulation, and good cause appearing, IT IS HEREBY  
3 ORDERED that:

5 (1) The deadline for Plaintiff to amend her complaint is extended by thirty-one  
6 (31) days, from April 29, 2022 to May 30, 2022.

7 IT IS SO ORDERED.  
8

9 Dated: \_\_\_\_\_, 2022

10 Hon. James Donato  
11 United States District Judge